DSJ1&2-PR Exh 576

From: Gates, Rick <2603eb99-5f51-40de-b6fb-eba4495e645e@walgreens.com>

Sent: Friday, May 20, 2011 10:59 AM

To: Ed Svihra <Ed Svihra/Corp/Walgreens@Walgreens>; Pinon, Dwayne

<dwayne.pinon@walgreens.com>; Cheryl Creek < Cheryl</pre>

Creek@Walgreens>; Tisdell, Lorinda <lorinda.tisdell@walgreens.com>; Georgia Lehoczky <Georgia Lehoczky@Walgreens>; Hoover, Eugene

<eugene.hoover@walgreens.com>; Gubbins, Terry

<terry.gubbins@walgreens.com>

Subject: Florida Focus on Profit (Svihra)

AII,

We have a call today with a subset of the team. I think we are in alignment with where we would like to g o with this process. Operations feels that this will be beneficial to improving standards and execution at st ore level.

Proposed Next Steps:

- 1. MPD's to work with Ed/Team to put in operational next steps following the LP/RXS 5 store audits.
 - LP to share results with MPD/RXS, Operational Follow up processes...
- 1. Ed -

Can we change the name for the more compliance based initiatives from "Focus on Profit" to maybe "Focus on Compliance" or something like that.

- The perception on "focus on profit" in regards to fulfillment of CII prescriptions doesn't seem to coincide.
- 1. LP/Compliance will recirculate the final product to the team for final review and we will move forward with the process.

Let me know if there is anything additional that I didn't capture or if any further discussion is necessary.

Thanks,

Rick

Rick Gates/Corp/Walgree ns

05/19/2011 11:26 AM

To Georgia Lehoczky, Terry

Gubbins/Corp/Walgreens@Walgre

ens, Eugene

Hoover/Corp/Walgreens@Walgree

ns, Ed

Svihra/Corp/Walgreens@Walgreen

s

cc Lorinda.Tisdell@walgreens.com,

Dwayne

Pinon/Corp/Walgreens@Walgreen

s, Cheryl Creek

Subje Fw

ct

Fw: Florida Focus on Profit

Terry, Georgia, Gene, and Ed,

Is there a time on Friday, May 20th (maybe 9am CST or 1pm CST) that we can all get on a quick call to discuss?

Thanks,		
Rick		
Forwarded by Rick Gates/Co	rp/Walgreens on 05/	19/2011 11:24 AM
Ed Svihra/Corp/Walgr eens		
05/17/2011 02:18 PM	То	dwayne.pinon@walgreens.com, Al Carter/Corp/Walgreens@Walgreens, Cheryl Creek/Corp/Walgreens@Walgreens, Georgia Lehoczky/East/OPS/Walgreens@Walgreens, Terry Gubbins/Corp/Walgreens@Walgreens
	сс	rick.gates@walgreens.com, Lorinda Tisdell/Corp/Walgreens@Walgreens
	Subje ct	Florida Focus on Profit

The recommendations that Dwayne suggested have been incorporated into the attachments below. Plea se discard any previous versions that were previously emailed to you.

Dwayne,

Thanks for your comments. Regarding webform #4 and #5, the LP Supervisors already know the protocol for reconciling onhand variances and how LPxRx results are investigated.

Thanks to all for your help,

Ed

--- Forwarded by Ed Svihra/Corp/Walgreens on 05/17/2011 02:06 PM ----

Dwayne Pinon/Corp/Walgreens

05/17/2011 11:00 AM

To Ed Svihra/Corp/Walgreens@Walgreens

cc Al Carter/Corp/Walgreens@Walgreens,

Cheryl

Creek/Corp/Walgreens@Walgreens

Subject Re: FL CII Focus on ProfitLink

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Ed:

I made a few suggested edits to the attached. In addition to Rick, you may want to have Lorinda take a lo ok at this since she participated in our initial meeting to discuss this issue and my understanding is that FI orida still falls within her jurisdiction. I have also copied AI & Cheryl for their comments since they are wor king on revising the current good faith dispensing policy & corresponding training materials.

With respect to the web form, I made some changes and have a few comments/questions which are liste d on the document. I am somewhat concerned about questions #7 AND #10 since they arguably imply th at a pharmacist should be more aggressively questioning prescriptions from pain clinic patients who come in all at once versus those that come as a steady stream and also should be more suspicious of pain clinic patients who happen to show up on warehouse day. If these are legitimate indicators of inappropriate p rescriptions perhaps we should consider not documenting our own potential noncompliance.

Dwayne A. Pinon, R.Ph. Senior Attorney, Litigation & Regulatory Law Walgreen Co. 104 Wilmot Road, MS #1434 Deerfield, IL 60015 (847) 315-4452 (847) 315-4660 (fax)

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Ed Svihra/Corp/Walgreens

05/16/2011 10:25 AM

То

rick.gates@walgreens.com

cc dwayne.pinon@walgreens.com

Subject Florida CII Focus on Profit

Rick,

As you may be aware, there was a change last October (2010) in how pain management clinics in Florida are being regulated, which has caused a significant increase in the number of CII prescriptions we are filling in the state. After discussions involving Regulatory Law, Loss Prevention in Florida, Terry Gubbins and Georgia Lehoczky, HealthCare LP has drafted a Florida-

specific Focus on Profit to address this situation (attached below). Our intent is to have our Loss Preventi on Supervisors, with the help of our Pharmacy Supervisors, review this FOP with a minimum of five stores in each district. Specific information will then be collected and analyzed to determine next steps. With the significant increase in these CII drugs being dispensed, we are formulating a plan prior to any potential review by outside agencies.

We would like to have Pharmacy Operations review the attachments below before implementation. One document is the FOP and the other is a mock up of a web-

form that we will develop to enter and gather information. (The LP Supervisor will be responsible for entering the information into the web-

form.) The information in red offers direction to the LPS and RxS so that we are consistent in our approach.

Please review, or forward to whomever you feel is the right person to review, the attachments below and forward comments back to me.

Thanks for your help,

Ed

 $[attachment \ "FL\ Focus\ on\ Profit\ V2.doc"\ deleted\ by\ Ed\ Svihra/Corp/Walgreens]\ [attachment\ "FL\ FOP\ -\ Web\ Form\ V2.doc"\ deleted\ by\ Ed\ Svihra/Corp/Walgreens]$